

# SEALED

U.S. DISTRICT COURT  
EASTERN DISTRICT-WI  
FILED

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

2020 SEP -1 P 12: 20

CLERK OF COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

**20-CR-155**

OBUMNEME E. OKPARA,  
a/k/a "Stephen Ade Ramota,"  
a/k/a "Hindi Musa,"

[Title 18, United States Code,  
Sections 1343 and 1956]

Defendant.

## SEALED INDICTMENT

### Background Allegations Common to All Counts

#### THE GRAND JURY CHARGES THAT:

1. Beginning in or about November 2018 and continuing through December 2018, in the State and Eastern District of Wisconsin and elsewhere,

**OBUMNEME E. OKPARA, a/k/a "Stephen Ade Ramota," a/k/a "Hindi Musa,"** knowingly devised and participated in a scheme to defraud and obtain money by means of false and fraudulent pretenses and representations, as described below.

2. The scheme was aimed at defrauding Company A into transferring funds to one or more bank accounts controlled by **OKPARA** and others participating in the scheme.

3. In executing the scheme, **OKPARA** and others used and caused the use of interstate wire communications. This included email messages and an electronic transfer of funds to a bank account opened and maintained by **OKPARA**, who used a false identity and a fictitious business name.

4. At all times relevant to this Indictment, the deposits of JPMorgan Chase Bank, N.A. ("Chase Bank") were insured by the federal government through the FDIC.

***The Scheme to Defraud***

5. As part of the scheme:

- a. **OKPARA** and others participating with him in the scheme registered "KPAM Investments LLC" ("KPAM") with the Wisconsin Department of Financial Institutions. The Articles of Organization identified "Stephen Ade Ramota" as KPAM's organizer and registered agent. In reality, "Ramota" was an alias meant to help **OKPARA** to evade detection.
- b. KPAM existed only on paper and had no legitimate business purpose. Instead, KPAM was used by **OKPARA**, pretending to be "Ramota," to open a business checking account, ending in digits 5021 (the "KPAM Account"), at a Chase Bank branch in Fox Point, Wisconsin. The KPAM Account was opened with intent to defraud, as explained below.
- c. Participants in the scheme sent fraudulent emails to Company A and Company B. These emails sought to impersonate an employee at Company B, and falsely purported to be legitimate communications from Company B. The emails directed Company A to submit payments it owed Company B to a new bank account purportedly belonging to Company B. These emails were intended to defraud both Company A and Company B because, in fact, the payment information provided in the emails corresponded to accounts that **OKPARA** and other participants in the scheme controlled, including the KPAM Account.

- d. On December 10, 2018, as a result of the fraudulent emails sent to Company A and Company B, Company A sent a wire transfer in the amount of \$69,000 to the KPAM Account.
- e. Between December 10 and December 12, 2018, **OKPARA**, purporting to be "Ramota," withdrew cash from the KPAM Account and purchased cashier's checks in the names of fictitious individuals and co-conspirators using proceeds of the wire fraud scheme. In addition to "Stephen Ade Ramota," **OKPARA** also used the name "Hindi Musa" (or "Musa Hindi") to facilitate these withdrawals.

**COUNT ONE**  
(Wire Fraud, 18 U.S.C. § 1343)

**THE GRAND JURY FURTHER CHARGES THAT:**

6. On or about December 10, 2018, in the State and Eastern District of Wisconsin and elsewhere,

**OBUMNEME E. OKPARA, a/k/a “Stephen Ade Ramota,” a/k/a “Hindi Musa,”** for the purpose of executing the scheme described above, knowingly caused to be transmitted in interstate commerce a wire transfer of \$69,000, from Company A, in California, to the KPAM Account that **OKPARA** set up and controlled, and aided and abetted the same.

In violation of Title 18, United States Code, Sections 1343 and 2.

**COUNTS TWO THROUGH FOUR**  
(Money Laundering, 18 U.S.C. § 1956(a)(1)(B)(i))

**THE GRAND JURY FURTHER CHARGES THAT:**

7. On or about the dates listed below, in the State and Eastern District of Wisconsin,  
**OBUMNEME E. OKPARA, a/k/a "Stephen Ade Ramota," a/k/a "Hindi Musa,"**  
knowingly conducted and attempted to conduct each of the financial transactions specified  
below.

8. Each transaction occurred through a financial institution and occurred in and  
affected interstate commerce.

9. Each transaction involved proceeds of a specified unlawful activity, that is, wire  
fraud, committed in violation of Title 18, United States Code, Section 1343.

10. While conducting each of the financial transactions, **OKPARA** knew that the  
property involved in the financial transactions represented the proceeds of some form of  
unlawful activity.

11. While conducting each of the financial transactions, **OKPARA** knew that the  
financial transactions were designed in whole and in part to conceal and disguise the nature,  
location, source, ownership, and control of the proceeds of specified unlawful activity.

<b><u>Count</u></b>	<b><u>Date</u></b>	<b><u>Description</u></b>
Two	December 12, 2018	Purchase of a cashier's check in the amount of \$9,500, payable to "Hindi Musa," using funds from the KPAM Account
Three	December 12, 2018	Withdrawal of \$9,500 in cash from the KPAM Account
Four	December 12, 2018	Withdrawal of \$2,400 in cash from the KPAM Account

Each in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

### **FORFEITURE NOTICE**

12. Upon conviction of the offense of wire fraud, in violation of Title 18, United States Code, Section 1343, as set forth in Count One of this Indictment, Defendant **OBUMNEME E. OKPARA** shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

13. Upon conviction of one or more money laundering offenses, in violation of Title 18, United States Code, Section 1956, set forth in Counts Two through Four of this Indictment, Defendant **OBUMNEME E. OKPARA** shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense or offenses of conviction.

14. If any of the property described above, as a result of any act or omission by the Defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

Dated: September 1, 2020

*for* San Khaterchi  
MATTHEW D. KRUEGER  
United States Attorney